

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
	:	
v.	:	DATE FILED: _____
	:	
BROOKE MURRAY	:	VIOLATION: 18 U.S.C. § 1344
	:	(bank fraud - 1 count)
	:	Notice of additional factors

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Sovereign Bank was a financial institution with branches located within the Eastern District of Pennsylvania. Its deposits were insured by the Federal Deposit Insurance Corporation ("FDIC").

2. From on or about March 9, 2002, through on or about March 11, 2002, in the Eastern District of Pennsylvania, defendant

BROOKE MURRAY

knowingly executed and attempted to execute a scheme to defraud Sovereign Bank and to obtain monies owned by and under the care, custody and control of the Bank by means of false and fraudulent pretenses, representations and promises.

THE SCHEME

It was part of the scheme that from on or about March 9, 2002, through on or about

March 11, 2002:

3. Defendant BROOKE MURRAY possessed a false identification document for the purpose of using it for identification to cash counterfeit checks.

4. Defendant BROOKE MURRAY, while posing as a woman identified here by the initials "A.C.," cashed five counterfeit checks totaling approximately \$9,730.62 at various branches of Sovereign Bank, each counterfeit check having been made payable to A.C.

In violation of Title 18, United States Code, Section 1344.

NOTICE OF ADDITIONAL FACTORS

THE GRAND JURY FURTHER CHARGES THAT:

1. In committing the offenses charged in Counts One through Four of this indictment, defendant

BROOKE MURRAY

a. committed offenses in which the intended loss exceeded \$5,000 as described in U.S.S.G. § 2B1.1(b)(1)(B).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney